

## States, Cities, and Others Pledge to Carry the Torch for U.S. GHG Emission Reduction Commitments

Lou Corio | Senior Technical Specialist

**T**he Trump Administration's recent decision to renounce greenhouse gas (GHG) emission reduction and financial commitments made by the previous administration under the Paris Climate Change Agreement ("the Paris Agreement") has galvanized a movement bringing together states, cities, and non-state entities (e.g., corporations) willing to meet those commitments as the next major international climate change conference draws near.

In December 2015, in Paris, 196 countries/parties to the United Nations Framework Convention on Climate Change (UNFCCC), including the U.S. under the Obama Administration, adopted by consensus an agreement to reduce GHG emissions, with the goal of limiting the global average temperature increase to no more than 2°C above pre-industrial levels. The Paris Agreement entered into force in November 2016 once enough parties ratified the accord. In addition to pledging to meet UNFCCC-published GHG emissions reduction targets, the U.S. committed to provide financial assistance to developing countries to help mitigate and adapt to climate change. Then President Obama had signed an executive order confirming the U.S.'s adoption of the Paris Agreement, but didn't submit it to Congress for approval.

In June 2017, the U.S. under the Trump Administration announced that it would cease implementing the provisions of the Paris Agreement. The U.S. would no longer submit/observe emission reduction pledges, and cancelled remaining financial commitments to developing countries. The Trump Administration was able to cancel U.S. commitments under the Paris Agreement because there had been no Congressional approval of those commitments. (*Note that the U.S.'s official withdrawal from the Paris Agreement actually can't happen until November 2020.*)



While a certain segment of the U.S. population welcomed President Trump's withdrawal from the Agreement, a large segment of the U.S. expressed shock and dismay, including a number of states, cities, universities, and corporations. Some of the U.S.'s closest European allies also expressed their disappointment with the Trump Administration's decision.

This past summer, following President Trump's announcement of withdrawal from the Agreement, three states—California, New York, and Washington—launched the bipartisan *United States Climate Alliance* ("the Alliance"). Shortly thereafter, 11 additional states and Puerto Rico joined the Alliance. The Alliance members together make up the third-largest economy in the world behind the U.S. and China. The Alliance has pledged to commit to the U.S.'s goal under the Paris Agreement to reduce GHG emissions by 26 to 28 percent from 2005 levels by 2025.

U.S. cities, including some the largest urban centers, followed suit, forming the *Climate Mayors* group. More than 380 mayors have signed on to an agree-

*emission reduction >>> continued on page 8*

# FROM THE TRENCHES

## GIS: The Merging of Analytics and Artistry

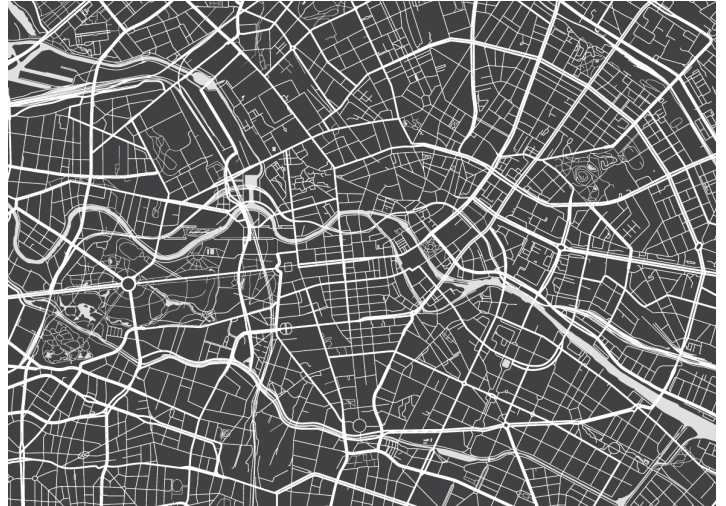
Kevin L. Garcia | GIS Technician

**G**eographic Information Systems, or GIS, is at its core a combination of analytics, artistry, and technicality. To be a GIS technician, one must be able to convey information in a visually-compelling format, as well as skilled in the realm of data management, which can be quite challenging at times. It's a duality and balance of these attributes that combine for great map making, maps that are critical in the way we define and perceive the world around us. GIS certainly sounded cool, which was why I was "drawn" to the area of study in the first place as an undergrad at Texas State University (TSU).

While attending school, I obtained a B.S. degree in Environmental Studies with GIS certification. The college was and still is known for a very large Geography department, so it felt pretty good to be a part of the community. Many of my friends from the department were talking about GIS, so I figured I'd check it out and I'm glad I did! It turns out there are many more components to GIS than I realized. Among the many interesting aspects of GIS, the one clear take away is that GIS can be incorporated into basically anything. Whether you are focused on conservation, statistics, or even business analytics, GIS can turn even the most complex of data into an easy visual representation.

After taking the introductory course in GIS, I found myself becoming involved with the SOGIS student-led organization on campus, which connected me with lots of other students, faculty, and industry professionals that shared the same curiosity as me. The club would have weekly meetings, events, and even yearly group projects. "Big name" organizations like ESRI or even NASA would provide guest speakers, which I thought was super exciting. The goal of the group was to better the TSU community and campus through the use of spatial planning and the application of GIS-based functions. I worked with the Student Wellness Program, which involved creating maps of the campus to show the distances, steps, and number of stairs to several of the main buildings from the College of Health Professions. Not only did I help with basic map creation for the university, but the information collected also helped the College of Health Professions in gauging how far most students would walk in and around campus on a daily basis.

In my last GIS class, GIS Design and Implementation, I had the opportunity to work with a mountain-biking club, the Austin Ridge Riders Association, by assisting them in mapping both Reimers Ranch and Muleshoe Bend. My job was to create maps displaying park boundaries, bike trails, flood plains, bathrooms, and emergency exits throughout the park areas. All the trails were displayed based on the level of difficulty to aid park visitors



as well as bike riders. I also was involved in a trail sustainability analysis to see which trails were susceptible to flooding and erosion by looking at floodplains and contour elevation data. The whole project was an effort to promote safety within the park areas, and to help the Ridge Riders identify which trail areas were unsuited for development. More importantly, the class gave me vital experience in working with my first real client! I got hands-on experience working with project submittals, timeframes, and budget expectations.

I also had the opportunity to intern for the City of San Marcos Habitat Conservation Plan. Some of the work I did there involved invasive species removal, water quality monitoring, riparian fence repairs, and litter clean up events. I also helped with conservation efforts to protect threatened and endangered species found local to the San Marcos and Comal River Systems, sometimes even taking a dive in the water when needed to determine how to improve river bank stabilization or to monitor plant species, such as the famous Texas Wild Rice. I couldn't have asked for a more exciting hands-on experience to finish off my final year at school! It was quite the experience working with scientists and naturalists to help preserve the ecosystems, and to inform river users on the importance of localized ecology within the San Marcos River.

I have been with Zephyr now for a little over six months, and I will say I love the work I'm doing. Being the youngest person in the company, there is something new to learn every day! It's astounding to me the sheer potential GIS can bring to the consulting industry, and what it can bring to client satisfaction. Graphics play a big role in first impressions, so it's my job to

*trenches >>> continued on page 6*

# AN ATTORNEY'S PERSPECTIVE

## *An Attorney's Perspective: Tips for Commenting on a Draft Air Permit*

Meredith Odatto Graham, Esq. | Babst, Calland, Clements and Zomnir, P.C.

**D**raft permit review is an important part of the air permitting process. Careful evaluation of the draft permit enables the permittee to head off possible compliance issues and otherwise refine the permit before it becomes final. As the permittee, you will typically have at least two chances to comment on a draft permit—once on a pre-draft version and again during the official public comment period. Take advantage of these opportunities to craft an air permit that best suits your facility, and keep in mind the following tips as you prepare written comments for submission to the agency.

**Establish an Internal Schedule:** The very first thing you should do upon receiving the draft permit is confirm how much time is available for the review. Double check the comment deadline and plan to meet it. You'll need ample time to review the relevant documents, gather internal input and prepare written comments. Make time to get feedback from the facility personnel who will actually implement the permit on a day-to-day basis. Mark the calendar and establish interim deadlines to keep the ball rolling. It may become necessary to request an extension, in which case you'll want to show that a good faith effort was made to meet the original deadline.

**Request the Draft Permit in a Writeable Format:** Ideally, your submission will include a "marked up" or redlined version of the draft permit which clearly shows the changes you are requesting. This is much easier to do when the agency can provide the draft permit in a writeable format such as Microsoft Word. In situations where an existing permit is in effect, it will be helpful to make a comparison document showing the differences between the existing permit and the draft permit. Ask the permit writer to provide a list of the changes he or she made to the permit, but don't rely on him or her to point out small changes that could have a big impact. Do your own side-by-side comparison of the permits.

**Ask for the Review Memo:** The permit writer will likely prepare an internal supporting memorandum in conjunction with the draft permit. This document may be referred to as the "review memo" or "Statement of Basis." It can provide helpful clues about how the permit writer determined what requirements to include in the permit. Surprised by something you see in the permit? Consult the review memo for an explanation and confirm that the agency relied on accurate facts.

**Check the Application and Other Permits:** The draft permit should conform to the information presented in the application. To the extent that another air permit (e.g., construction approval)



is being consolidated with the draft permit, confirm that they were appropriately combined.

**Verify Rule Applicability:** Federal and state air pollution control rules like New Source Performance Standards will appear in the permit. Some agencies will incorporate by reference only, whereas others will insist on including the relevant text of the regulation in the permit. Are affected facilities such as stationary emergency engines properly characterized in the permit, in terms of regulatory status? Consider documenting exemptions and non-applicability determinations in the permit to take advantage of a permit shield.

**Do a Practice Run:** Some air permits (most notably Title V permits) require the permittee to certify compliance with each condition. For this reason, it is recommended that you locate the compliance certification forms you will eventually need to submit and do a practice run using the draft permit. Can you reasonably comply with each condition as written?

**Speak with the Permit Writer:** For the sake of efficiency, before submitting your written comments, it may be helpful to have a preliminary call with the permit writer to clarify agency intent and focus on the list of issues.

**Check for Typos:** It goes without saying that you should take a hard look at the entire permit. Double check numerical limits, equipment specifications (e.g., throughput ratings), source descriptions and cross-references. Is the right stuff in the right place? All of this will become binding once the permit is finalized, at which point it may be difficult to make changes.

*perspective* >>> *continued on page 6*

# News Briefs

## national news

### **EPA Reverses Decision to Delay 2015 Ozone NAAQS Implementation Date**

On August 2, EPA withdrew the one-year extension for nonattainment area designations for the 2015 ozone NAAQS published on June 28. The deadline reverts back to October 1, 2017. EPA determined that the extension is unnecessary because data gaps for promulgating the designations may not be as expansive as previously believed. Another impetus was a lawsuit filed by 15 states and the District of Columbia in the U.S. Court of Appeals challenging the delay. In related legislation, the House of Representatives passed H.R. 806 (Ozone Standards Implementation Act of 2017) on July 18. Final 2015 area designations would not be due until October 2025 under this law. The House referred the bill to the Senate on July 19. For more information, contact Roger Brower at 410.312.7907 or [rbrower@zephyrenv.com](mailto:rbrower@zephyrenv.com).

### **EPA Approves 17 Alternative Methods for Drinking Water Contaminant Analysis**

Effective July 27, EPA approved the use of 17 alternative testing methods for measuring the levels of contaminants in drinking water and determining compliance with national primary drinking water regulations. The testing methods that the EPA is authorizing affect measurements of pH, turbidity, radionuclides, total coliforms and E. coli, arsenic, lead, beryllium, selenium, nitrate, and nitrites. All approved analytical testing methods are identified in Appendix A of Subpart C of 40 CFR Part 141. The approval of these methods will provide public water systems, laboratories, and regulatory agencies with greater flexibility and access to analytical methods, and enable them to uphold public health protection while reducing monitoring costs. For more information, contact Michele Foss, REM at 281.668.7342 or [mfoss@zephyrenv.com](mailto:mfoss@zephyrenv.com).

### **TSCA Inventory Notification Report Due February 2018**

The Toxic Substances Control Act (TSCA) Inventory Notification (Active-Inactive) Requirements or “Inventory Reset Rule” seeks to identify which of the 85,000 chemicals on the TSCA Inventory are still active in commerce. The rule, published on August 11,

introduces two new reporting requirements for manufacturers, importers, and processors of chemical substances. The first is a retroactive requirement, requiring all manufacturers and importers (by February 7, 2018), and processors (by October 5, 2018) of chemical substances to report all chemical substances they manufactured, imported, or processed for non-exempt commercial purposes for the ten years preceding June 2016. The second requirement obliges manufacturers, importers, and processors to file a notice with EPA no more than 90 days prior to manufacturing, importing, or processing an inactive chemical substance. For more information, contact Zoe Trieff at 512.879.3951 or [ztrieff@zephyrenv.com](mailto:ztrieff@zephyrenv.com).

### **EPA Removes HCL Alternative Monitoring**

On August 22, EPA published a final rule to remove provisions that had been added to the Portland Cement NESHAP (PC MACT) on June 23, 2017 in a direct and final rule. The provisions added in June allowed for an alternative monitoring method for Hydrochloric Acid (HCl) Continuous Emissions Monitoring devices (CEMS) because of the unavailability of HCl CEMS calibration gases. There were adverse comments received on the June 23 final rule, therefore as stated in June publication, EPA is removing those revisions and restoring the original pre-June rule language. In the August publication, EPA indicated that it will go forward with proposing similar alternative monitoring provisions again, except this time with a public comment period. For more information, contact Anna de la Garza, P.E. at 512.579.3821 or [adelagarza@zephyrenv.com](mailto:adelagarza@zephyrenv.com).

### **New and Modified Sampling and Analysis Procedures for CWA Compliance Approved**

A final EPA rule effective September 27 modifies a number of sampling and analysis procedures that must be used by the Clean Water Act (CWA) to monitor water quality, meet pollutant limits, and report to regulatory authorities. The changes include new and revised EPA methods, updated versions of currently approved methods, and amendments to the procedure for determining the method detection limit (MDL). For more information, contact Dave Sorrells, P.E. at 512.879.6626 or [dsorrells@zephyrenv.com](mailto:dsorrells@zephyrenv.com).

### **EPA Adopts 2017 NAICS Code Revisions for 2018 TRI Reporting**

On August 17, EPA issued a direct final action to update the list of North American Industrial Classification System (NAICS) codes used to classify facilities subject to reporting under the Toxic Release Inventory (TRI). As a result of these revisions, facilities will be required to use the 2017 NAICS codes for reporting toxic releases and other waste management quantities beginning with TRI forms that are due on July 1, 2018. Additionally, EPA is making amendments to the list of exceptions and limitations associated with NAICS codes for TRI Reporting by deleting the descriptive text. This rule does not add any new reporting requirements. If EPA does not receive adverse comments, it will become effective November 15, 2017. For more information, contact Natasha Halageri at 281.668.7345 or [nhalageri@zephyrenv.com](mailto:nhalageri@zephyrenv.com).

### **EPA Reconsiders Portion of NESHAP for Amino/Phenolic Resins Manufacturing**

EPA is presently reconsidering the current Amino/Phenolic Resin Maximum Achievable Control Technology (MACT) standards and has asked for comments by October 23, 2017. Specifically, EPA proposed revisions to the existing source back-end continuous process vent (CPV) standards based on hazardous air pollutant (HAP) emissions test data submitted by petitioners. EPA is now proposing a production-based limit for back-end CPVs rather than the existing post-control limit which they believe to be unrealistic. Lastly, the EPA is proposing requirements for storage vessels at new and existing sources when an emission control system used to control vents on fixed roof tanks is undergoing planned routine maintenance since there is precedent for this in similar rules. For more information, contact Tiffany Dillow, REM at 410.312.7903 or [tdillow@zephyrenv.com](mailto:tdillow@zephyrenv.com).

### **CCR Wastewater Compliance Dates Postponed**

On September 18, EPA postponed the earliest compliance dates for the November 3, 2015 best available technology (BAT) and pretreatment standards for existing sources (PSES) for steam electric generating point source discharges for two years. EPA indicated they are only postponing the compliance date for BAT effluent limitations for flue gas desulfurization (FGD) wastewater and bottom ash transport water associated with coal combustion residuals (CCR). EPA does not intend to perform rulemaking to revise the 2015 effluent standards for the other coal combustion residual wastewaters, and is not amending the 2015 effluent limitations guidelines and standards for the steam electric generator point source category. For more information, contact Betty Moore, P.G. at 512.879.6622 or [bmoore@zephyrenv.com](mailto:bmoore@zephyrenv.com).

### **Exporters of Hazardous Waste to Use Electronic Process**

Starting December 31, exporters or their authorized agents will no longer be able to use a paper process for documenting imports and exports, and will have to file certain EPA data in the AES data system, which resides in the U.S. Customs and Border Protection's (CBP's) Automated Commercial Environment (ACE). Notably, RCRA waste exports subject to consent requirements will utilize AES in place of existing paper processes at the port or border crossing required to clear export shipments for departure. Currently, exports of hazardous waste, including those eligible for the alternate management standards of 40 CFR part 273 (i.e., universal waste) or 40 CFR part 266 (e.g., spent lead acid batteries being shipped for recycling), and exports of cathode ray tubes for recycling are subject to RCRA consent requirements. For more information, contact Linda Salzar, CHMM at 512.879.6630 or [lsalzar@zephyrenv.com](mailto:lsalzar@zephyrenv.com).

### **Revisions Proposed to Condensable PM Measurement Method**

In September 2017, EPA published proposed technical revisions and editorial changes to clarify and update the procedures specified in Method 202, with the goal of improving consistency in results obtained across the stack testing community. Method 202, also known as the "dry impinger" method, outlines the procedures that stack testers must follow for measuring condensable particulate matter (CPM) emissions from stationary sources. The proposed revisions are consistent with steps EPA has taken since 2010, both through regulation and formal guidance, to 1) improve implementation of the method and 2) promote consistency in the measurement of CPM by removing procedural options in the method. For more information, contact Lou Corio at 410.312.7912 or [lcorio@zephyrenv.com](mailto:lcorio@zephyrenv.com).

### **EPA Amends Standards and Practices for Inquiries Under CERCLA**

On September 15, final action was taken by EPA to amend the Standards and Practices of the All Appropriate Inquiries (AAI) Rule by updating references to ASTM International standards, which may be used to comply with the AAI provision of CERCLA. This update replaces the reference to ASTM E2247-08 "Standard Practice for Environmental Site Assessments: Phase I ESA Process for Forestland or Rural Property" with the updated ASTM E2247-16 standard of the same name. Parties wishing to satisfy one of the CERCLA landowner liability protections may conduct all appropriate inquiries to follow the provisions of the AAI Rule at 40 CFR Part 312, and using the ASTM E1527-13 Standard or the ASTM E2247-16 standard, as applicable. This

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final rule update becomes effective on March 14, 2018. For more information, contact Paul C. Moore, P.G. at 512.879.6642 or [pmorre@zephyrenv.com](mailto:pmorre@zephyrenv.com).

## state news

### TCEQ Provides Guidance and Resources to Assist with Hurricane Response Efforts

The Texas Commission on Environmental Quality (TCEQ) has a page on their website dedicated to providing guidance for individuals and regulated facilities dealing with the aftermath of Hurricane Harvey. Regulatory guidance on the suspension of TCEQ rules, fuel waivers, waste management, wastewater treatment plants, drinking water, and air quality is available on this page and is frequently updated. Status of drinking water and wastewater systems, flood water sampling, and superfund sites can also be found on this site. Regulatory information and guidance on the hurricane response topics can be found on the TCEQ Homepage under the *Hurricane Harvey Response* link. For more information, contact Laura Huff, P.E. at 512.879.4341 or [lhuff@zephyrenv.com](mailto:lhuff@zephyrenv.com).

### TCEQ Delays Launch of New Tier II Reporting Website

TCEQ is transitioning to an online web-based reporting system for Tier II, however, due to the ongoing response and recovery efforts from Hurricane Harvey, it is being delayed until after April 2018. The 2017 Tier II reports (due March 1, 2018) will still be submitted using EPA's Tier2Submit software. However, to ensure data is migrated to the online system, all Tier II reports must contain a Customer Number (CN), a Regulated Entity Number (RN) and a TXT2 number. You can apply for these numbers on STEERS. Visit the Tier II program website for information on Tier II Chemical Reporting training opportunities. [ <http://www.texastier2.org>. ] For more information, contact Bonnie Blam at 512.579.3817 or [bblam@zephyrenv.com](mailto:bblam@zephyrenv.com).

### TCEQ Proposes Revisions to Texas Surface Water Quality Standards

Rulemaking for the revision of the 2014 Texas Surface Water Quality Standards began in July of 2015. Draft rules were presented to the TCEQ commissioners on August 23, 2017, and the draft rule package was approved for formal public comment. Public notice commenced on September 8 followed by a public hearing in Austin, Texas on October 16. Proposed changes include revisions to statewide toxic criteria to incorporate new data on toxicity effects and revised EPA procedures; revisions and additions to site specific toxicity criteria for selected water bodies; revisions to designated uses of various water bodies; and bacterial calculations and other provisions affecting coastal waters to comply with the federal Clean Water Act. For more information, contact Julie Morelli, P.G. at 210.951.6424 or [jmorelli@zephyrenv.com](mailto:jmorelli@zephyrenv.com).

### TCEQ Issues GOP 511 and 514 Revisions to Address Wise County Applicability Status

TCEQ issued revisions to Title V General Operating Permits (GOPs) 511 and 514 on July 14 to address the applicability status of Oil and Gas sites located in Wise County. Wise County is now designated as moderate nonattainment for ozone as part of the 8-hour 2008 Ozone NAAQS and oil and gas sites in Wise County are now covered under GOP 511 instead of GOP 514. GOP 511 revisions incorporate changes in 30 TAC 115 (Control of Air Pollution from VOCs) and 30 TAC 117 (Control of Air Pollution from Nitrogen Compounds) for Wise County. Current permit holders were required to apply for a new authorization to operate (ATO) no later than October 12 if any of the emission units or applicability determinations were affected by the revised GOPs. For more information, contact Matt Miller at 512-579-3841 or [mmiller@zephyrenv.com](mailto:mmiller@zephyrenv.com). ✨

continually improve and adopt new applications to our GIS work, as the technology is continually evolving. What I love about GIS is that it's the perfect interface for dealing with environmental observation. While the data itself is fundamentally concrete, using it with GIS is perfect for analyzing the ever-changing nature of the world around us. ✨

**Establish a Basis for Appeal:** A permittee generally has the right to appeal any unsatisfactory conditions once the permit is issued as final. You should comment to provide a complete administrative record that will be beneficial to any appeal that may be filed. This calls for vigilant review of the draft permit and a thoughtful presentation of the issues. ✨

## In Memoriam — Remembering David Cabe

Maria M. Gou | President

Most of us count ourselves fortunate to meet someone that truly makes an impact in our lives. For me and many of us at Zephyr, that “someone” was David Cabe. We each have our own great memories of him. I met David in 1997 when I joined Zephyr, this unique environmental consulting firm that David founded in 1994 along with four of his esteemed colleagues. I remember how much David immediately impressed me with his technical knowledge and work ethic, but most of all his humor and kindness.

David was well-respected in the environmental community. He worked on complex air permitting, air dispersion and litigation support projects. David was a hard-working consultant, and never asked anyone to do more than he was willing to do himself. One of his nicknames at Zephyr was “the dump truck” — he was always willing to carry a heavy load.

However, he was not only a valued resource to his clients and colleagues. He was also valued as a humble leader and a cherished mentor until his retirement in 2012.

Although trained in the sciences, David was a brilliant storyteller and a gifted writer with an ability to express the most complex topics in a simple and straightforward manner. He was instrumental in the development of Zephyr’s Quality Program and our internal training series with the launch of a technical writing training module. We used to joke with one another about writing edits from David with red ink dripping off the page, but in fact he helped to train a lot of engineers and scientists to write clearly and concisely.

It is therefore no coincidence he was the creator of this publication, *Currents*, which he envisioned as a vehicle to communicate technical topics as well as to share perspectives and experiences in the environmental world. He saw value in sharing these events in a more conversational manner in the format of “From the Trenches” and “Attorney’s Perspectives” articles.

In 2012 we knew we would miss David following his retirement, so it was hard to say goodbye. Instead of doing so again, Zephyr would like to join his friends and family in celebrating his life. David Cabe will be greatly missed. ✨

Here are a few sentiments offered directly from staff, in response to the tribute on our website, or from family memories:

“an amazing person  
a true gentleman

hard to imagine the world without him in it, we  
are less than we were

best punster, joker, and Grandfather

he was brilliant, kind, humble and humorous

so smart, so capable, such a pleasure to work with  
heaven definitely got an angel

## zephyr Currents

October 1998  
a publication of  
Zephyr Environmental  
Corporation

### The Record Shows: Deficient Process Safety and Training Programs Can Lead to Industrial Accidents

The U.S. Chemical Safety and Hazard Investigation Board (CSB) reports that this year’s work is being completed. The following information is being released as the CSB has completed its investigation, reporting that the process safety and training programs at industrial sites.

The CSB has reported results that are graphically underscore the need for effective process safety and training programs at industrial sites.

The CSB found that the facility’s Process Safety Management (PSM) program was deficient in many essential elements. These deficiencies led to the 2005 explosion, which caused the release of toxic gas, resulting in the deaths of two workers and the evacuation of the plant’s 100,000 residents.

CSB’s investigation is ongoing. The CSB is currently reviewing the records of the plant’s PSM program and will release its final report in the next few months.

For more information on this and other environmental news, visit our website at [www.zephyrenv.com](http://www.zephyrenv.com).

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zephyr environmental corporation

### News Briefs

#### Consolidated Permitting: It’s Not Just About Water

Under the Clean Water Act (CWA), the Environmental Protection Agency (EPA) has been authorized to consolidate the NPDES permit and other regulatory programs into a single “consolidated” permit program. EPA has issued a “Final” rule for this program, which will be published in the Federal Register in the next few weeks.

The rule will require permittees to submit a single application for all NPDES permits, as well as other permits that are required for the same activity. This will streamline the permitting process and reduce the burden on permittees.

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...the results of process and hazard assessments, and emergency response, and...  
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#### Zephyr is now on the Web

We are pleased to announce that our new Web site is now online. It is the most comprehensive and up-to-date source of information on our services and products. Please visit our Web site at <http://www.zephyrenv.com>.

The new Web site provides information on our services and products, and is available in both English and Spanish. Please visit our Web site at <http://www.zephyrenv.com>.

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...investigating and preventing chemical-related accidents. In September, the CSB issued a report on the 2005 explosion at the West Virginia Chemical Industry Institute (WVCI) in Moundsville, West Virginia. The report found that the explosion was caused by a failure in the plant’s PSM program.

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Zephyr is a full-service environmental, health, and safety firm offering consulting, training, and data systems services to clients worldwide. We specialize in air and water quality, waste management and cleanup issues, incident management, natural resources, and workplace and community safety.

*Currents* is published quarterly by Zephyr Environmental Corporation, is edited by Joe Zupan, and designed by Allen Griffith of Eye 4 Design. Current and past issues of this newsletter are available on our website. For more information about *Currents*, or to add your name to our subscription list, please email: [currents@zephyrenv.com](mailto:currents@zephyrenv.com) or visit [www.zephyrenv.com](http://www.zephyrenv.com).



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ment to “adopt, honor, and uphold” the commitments to the goals of the Paris Agreement for their cities.

Non-governmental organizations also joined the initiative to keep the Paris Agreement commitments alive. Before the Trump Administration had announced its withdrawal from the Paris Agreement, more than 1,100 businesses and 280 institutional investors, including at least two dozen Fortune 500 companies, had signed on to a letter asking the President to keep the U.S. in the Paris Agreement. After the withdrawal announcement, a group of public and private entities organized the *We Are Still In* declaration involving states, cities, and businesses pledging to work towards meeting the Paris Agreement goals. Declaration signatories included leaders from 9 states, nearly 240 cities and counties, more than 1,700 businesses and investors, and more than 320 colleges and universities.

This past summer, Michael Bloomberg (former New York City Mayor) and California Governor Jerry Brown teamed up to launch *America's Pledge* on climate change. The purpose of this initiative is to compile GHG emission reduction-related activities and quantify emission reductions of states, cities, and businesses consistent with the goal of the Paris Agreement. The Bloomberg Philanthropies organization pledged to provide up to \$15 million to the U.N.'s climate secretariat, which is the amount the U.N. stands to lose because of the U.S. withdrawal from the Agreement.

In addition to committing to these national initiatives, a number of states and cities have joined the *Under2*

*Coalition*, which is an international alliance of subnational entities organized in the wake of the Paris Climate Change Conference. *Under2 Coalition* members must sign a Memorandum of Understanding (MOU) committing to reduce their GHG emissions 80 to 95 percent below 1990 levels, or limit GHG emissions to 2 metric tons per year per capita, by 2050. So far, 10 states, one county, and 12 cities in the U.S. (including Austin, Texas) have signed the MOU.

The next international meeting on climate change — the 23rd Conference of the Parties to the UNFCCC (“COP23”) — takes place in November 2017 in Bonn, Germany. Governor Brown was named Special Advisor for States and Regions for COP23. A group of U.S. governors, mayors, and business leaders, including Governor Brown and Mr. Bloomberg, will compile and showcase existing emission reduction commitments of U.S. subnational jurisdictions and non-state entities at COP23.

The formation of subnational alliances and coalitions supporting the U.S.'s Paris Agreement commitments in the two years following the Paris Climate Change Conference should bring a new dynamic and energy to COP23. Recent history has shown that the “top-down” approach for achieving GHG emission reduction targets cannot be relied upon, so a “bottom-up” movement has taken root. The withdrawal of the U.S. from the Paris Agreement was a watershed event that has helped fuel this movement. ✨